

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiff,

V.

HARMAN INTERNATIONAL INDUSTRIES,
INCORPORATED,

Defendant.

Civil Action No.: 05-10990 DPW

**ASSENTED-TO MOTION FOR ENTRY OF STIPULATION AND
ORDER AMENDING PROTECTIVE ORDER**

Pursuant to Rule 16(c) of the Federal Rules of Civil Procedure, Defendant Harman International Industries, Inc. (“Harman”) submits this stipulation and assented-to Motion for Entry of the attached Proposed Stipulation and Order Amending the Protective Order Regarding Confidentiality. As reasons therefore, Harman states as follows:

1. The Court entered a Stipulated Protective Order Regarding Confidentiality ("Protective Order") in this action on January 31, 2006;
2. The parties have met and conferred in good faith and have agreed upon the terms of the Proposed Stipulated Order Amending Protective Order Regarding Confidentiality, attached hereto as Exhibit A, to govern discovery in this case.

WHEREAS, Harman respectfully requests that the Court enter the Proposed Stipulated Order Amending the Protective Order Regarding Confidentiality, attached hereto as Exhibit A, to govern discovery in this case.

Dated: March 22, 2006

Respectfully submitted,

/s/ Ann H. Chen

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Attorneys for Defendant

LOCAL RULE 7.1(A)(2) CERTIFICATE

Counsel for Harman International Industries, Incorporated hereby certify that they have conferred with opposing counsel on the matters set forth in the foregoing Motion and that plaintiff Massachusetts Institute of Technology has assented to this Motion.

/s/ Ann H. Chen
Ann H. Chen

EXHIBIT A

3. In addition to the individuals identified in Paragraph 6 of the Protective Order, the following additional individuals shall have access to any information, documents and things designated as "Highly Confidential" under this Protective Order:

- a. the Designated Representative for each Party, as set forth in Paragraph 5(b) of the Protective Order.

Stipulated and Agreed to this 23rd day of March, 2006.

Massachusetts Institute of Technology

By its attorneys,

/s/ Steven M. Bauer
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Harman International Industries, Inc.

By its attorneys,

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SO ORDERED:

Douglas P. Woodlock
United States District Judge

Dated